



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9

**75 Hawthorne Street
San Francisco, CA 94105-3901**

FEBRUARY 17, 2010

Mr. John Sempert
Whiteriver Unified School District No. 20
959 South Chief Avenue
P.O. Box 190
Whiteriver, AZ 85941

Subject: No Further Action (NFA) for the Former Underground Storage Tank Facility at the Transportation Building Yard for Whiteriver Unified School District #20 (EPA ID# WMAP-038)

Dear Mr. Sempert:

The U.S. Environmental Protection Agency (EPA) has reviewed the report entitled "Underground Storage Tank Removal" ("closure report") that was prepared by Adams & Wendt for the former underground storage tank (UST) facility at the Transportation Building Yard for Whiteriver Unified School District #20. The closure report documents the removals of two USTs and the associated piping and dispensers at the facility in October 2009.

Site Background

The UST system at the Transportation Building Yard for Whiteriver Unified School District #20 was installed in June 1988 and operated through October 2009. This system consisted of a 6,000 gallon gasoline UST and a 6,000 gallon diesel UST that were used for fueling vehicles operated by Whiteriver Unified School District.

Site Closure Activities and Analytical Data

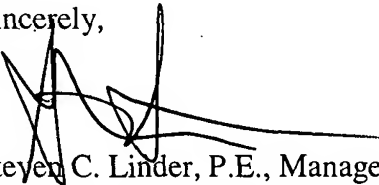
Closure activities began at the site on October 12, 2009 and the USTs were removed from the site on October 14, 2009. The closure report documents that the UST excavation, including the piping trenches and below-dispenser areas, appeared free of hydrocarbon contamination based on visual and olfactory indicators, and that the two fiberglass USTs were in good condition. The closure report also notes that 10 soil samples were collected and analyzed by Columbia Analytical Services for benzene, toluene, ethylbenzene and xylenes (BTEX) using EPA Method 8260, and total petroleum hydrocarbons (TPH), as gasoline and diesel, using EPA Method 8015. Mr. Terry Hill, with the Environmental Protection Office (EPO) of the White Mountain Apache Tribe, observed the UST closure activities.

However, the soil sample collected below the diesel dispenser showed a TPH as diesel concentration of 64 milligrams per kilogram (mg/kg), which is below the 1,000 mg/kg TPH cleanup level contained in the White Mountain Apache Tribe's "Interim Standards for Cleanup Levels in Soil", dated May 1997. The analytical results for the other nine soil samples collected during the UST closure activities showed no detections of BTEX or TPH, as gasoline or diesel.

Conclusion

EPA discussed the UST closure field work and the findings of the closure report with Mr. Hill on February 9, 2010. Mr. Hill noted that the UST excavation appeared free of hydrocarbon contamination during his field oversight, and he supported closure of this facility based on his field observations and the analytical data. Based on these findings, EPA and the Tribal EPO are not requiring further action for this site at this time. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater, EPA or the Tribal EPO may require additional site work. If you have any questions regarding this letter, please contact Chris Prokop of my staff at (415) 972-3363.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Linder", with a long horizontal flourish extending to the right.

Steven C. Linder, P.E., Manager
Underground Storage Tanks Program Office

cc: Brenda Begay, Environmental Manager, EPO, White Mountain Apache Tribe
Terry Hill, Environmental Specialist, EPO, White Mountain Apache Tribe
Chris Prokop, EPA (copy to site file)